

CONFIDENTIAL

OGC and DDA
19 March 1979

Extract from Staff Meeting Minutes of 16 March 1979

Lapham reported also on the dilemma posed by the current draft of the Ethics in Government Act. For one thing, there is a jurisdictional dispute between the Justice Dept. and the Office of Personnel Management's draft of the Act. The dispute centers on who should write regulations implementing provisions of the law which imposes criminal sanctions for post-employment activities. Justice maintains that it alone is responsible for providing legal guidance in this area and is undertaking the drafting of regulations. DOD and others have also expressed considerable opposition to broad interpretation of the law in the current OPM draft. Lapham is at a loss as to how Agency employees who will be affected (mainly, GS-17s and above) should be advised before Act becomes law in July 1979. It was agreed that Lapham's office will coordinate with the DDA toward a meaningful way to at least alert our senior employees on how the Act is likely to affect them. (Action: OGC and DDA)

25X1

25X1

CONFIDENTIAL